

April 18, 2025

BY ECF

The Honorable Ona T. Wang
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
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Re: *King v. Habib Bank Limited*, Case No. 1:20-cv-04322-LGS-OTW, Joint Status Letter

Dear Judge Wang:

The parties jointly submit this status letter pursuant to the Court's April 3, 2025 Order (Dkt. 396).¹

I. Status of Discovery

Pursuant to this Court's March 31, 2025 and April 9, 2025 Orders (Dkts. 395, 401), HBL produced the State Bank of Pakistan reports on April 14, 2025, and intends to make rolling productions and complete its production of "Foreign Regulators Reports" by May 5, 2025.

The parties met and conferred in-person in the courthouse after the April 2, 2025 conference to discuss HBL's proposals to further narrow the scope of collection and production of paper checks. The parties have since continued to confer via email and by telephone regarding proposed sample parameters through the filing of this letter. The parties exchanged proposals for two samples of checks (approximately 650 checks in total) in an effort to minimize the remaining number of checks for collection, and are continuing to discuss the parameters of the sampling exercise. Depending on the outcome from the production of those samples, and accounting for the parties' prior negotiations to exclude certain customers, the parties presently estimate that HBL at most would need to search for paper checks associated with about 7,945 transactions. However, the parties expect this number might be reduced significantly through the sampling exercise. The parties are also continuing to meet and confer over the production of additional transactional data besides the paper checks.

The parties thus request that the Court extend the current fact discovery deadline to May 16, 2025, to allow the parties to continue to negotiate on these issues. The parties propose that they include, in their May 16, 2025 joint status letter, an update on the progress of their negotiations and the status of discovery, as well as a proposed schedule for the conclusion of discovery.

¹ The parties understand this letter to also serve as their Joint Status Letter for the month of April 2025.

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II. Privilege-Log Dispute Letter Briefs

Pursuant to this Court's April 3, 2025 Order (Dkt. 396), HBL respectfully informs the Court that it does not object to the filing on the docket of the letter briefs that were submitted to chambers for *in camera* review on August 8, 2024, provided that HBL be permitted to redact limited portions of its letter brief for privilege, and that it be permitted to file under seal an exhibit that contains confidential material subject to the Amended Stipulation and Protective Order (Dkt. 268).

Plaintiffs do not object to the filing of their letter brief and Exhibit B to the same on the docket with no redactions. The parties propose that Exhibit A (HBL's complete privilege log) be filed under seal because an excerpted version of the log is attached to and will be filed with HBL's letter brief. Plaintiffs take no position on whether HBL's proposed sealing of portions of its letter brief and exhibits is proper as Plaintiffs have not seen the sealed material.

Respectfully submitted,

s/ Claire A. DeLelle

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